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11 United States of America

12  
13 IN THE UNITED STATES DISTRICT COURT  
14  
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 CASE NO: 1:24-CR-00255-JLT-SKO

18 Plaintiff,

19 STIPULATION REGARDING PROTECTED  
20 INFORMATION; PROTECTIVE ORDER

21 v.

22 MARVIN CHARO COLLINS,  
23 aka Aamir Ayoub El Bey

24 Defendant.

25 WHEREAS, the discovery in this case contains a large amount of personal information including  
26 Social Security numbers, personal identification numbers, dates of birth, financial account numbers,  
telephone numbers, and residential addresses (“Protected Information”); and

27 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the  
28 unauthorized disclosure or dissemination of this information to anyone not a party to the court  
proceedings in this matter;

29 The parties agree that entry of a stipulated protective order is appropriate.

30 THEREFORE, the defendant, MARVIN CHARO COLLINS, by and through his counsel of  
31 record (“Defense Counsel”), and plaintiff the UNITED STATES, by and through its counsel of record,  
32 hereby agree and stipulate as follows:

33 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
34 Criminal Procedure and its general supervisory authority;

1       2. This Order pertains to all discovery provided to or made available to Defense Counsel as  
2 part of discovery in this case (hereafter, collectively known as “the discovery”);

3       3. By signing this Stipulation, Defense Counsel agrees not to share any documents that  
4 contain Protected Information with anyone other than Defense Counsel and designated defense  
5 investigators and support staff. Defense Counsel may permit the defendant to view unredacted  
6 documents in the presence of his attorney, defense investigators, and support staff. The parties agree  
7 that Defense Counsel, defense investigators, and support staff shall not allow the defendant to copy  
8 Protected Information contained in the discovery. The parties agree that Defense Counsel, defense  
9 investigators, and support staff may provide the defendant with copies of documents from which  
10 Protected Information has been redacted;

11       4. The discovery and information therein may be used only in connection with the litigation  
12 of this case including exhaustion of direct and collateral appellate proceedings and for no other purpose.  
13 The discovery is now and will forever remain the property of the Government. Defense Counsel will  
14 return the discovery to the Government or certify that it has been destroyed at the conclusion of the case  
15 including exhaustion of direct and collateral appellate proceedings;

16       5. Defense Counsel will store the discovery in a secure place and will use reasonable care to  
17 ensure that it is not disclosed to third persons in violation of this agreement;

18       6. Defense Counsel shall be responsible for advising the defendant, as well as Defense  
19 Counsel’s employees, other members of the defense team, and defense witnesses, of the contents of this  
20 Stipulation and Order; and

21       7. In the event that the defendant substitutes counsel, undersigned Defense Counsel agrees  
22 to withhold discovery from any new counsel unless and until substituted counsel agrees also to be bound  
23 by this Stipulation and Order.

24       IT IS SO STIPULATED.

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1 DATED: December 3, 2024

/s Eric Kersten

2 ERIC KERSTEN  
Defense Counsel

3 DATED: December 3, 2024

/s Arelis M. Clemente

4 ARELIS M. CLEMENTE  
Assistant United States Attorney

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24  
25  
26  
27  
28 ORDER

29 For good cause shown, the foregoing stipulation between counsel regarding discovery and  
30 treatment of Protected Information is approved.

31  
32 IT IS SO ORDERED.

33 Dated: December 4, 2024

34 /s/ Sheila K. Oberto

35 UNITED STATES MAGISTRATE JUDGE